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November 14, 2003

Thomas J. Krueger, Esq.  
Associate Regional Counsel  
U. S. Environmental Protection Agency, Region 5  
77 W. Jackson Blvd., 13th FL  
Chicago, IL 60604

**Re: Suburban Self Storage  
2333 Wisconsin Avenue  
Ellsworth Industrial Park Site, Downers Grove, Illinois**

Dear Tom:

As you know, I represent Suburban Self Storage in connection with the above-referenced site. I have enclosed a copy of a September 29, 2003 Expert Report prepared by Ronald B. St. John of Clayton Services Group, Inc., which was prepared on behalf of the Lockformer Company and was served on the parties in the case captioned LeClercq v. The Lockformer Co., No. 00 CV 7164 (N.D. Ill.) on or about September 29, 2003, for your review.

Lockformer's Expert Report further supports Suburban Self Storage's conclusion that it has not caused or contributed to any of the alleged Ellsworth Industrial Park contamination, or to any alleged contamination affecting the LeClercq Class Area. The Expert Report states that it "discusses the contaminant contribution to the LeClercq Class Area by the . . . companies [including] Suburban Self Storage . . . ." See Expert Report at 1. However, the Expert Report does not contain any subsequent reference to Suburban Self Storage, and allocates no percentage of liability for contaminant contribution to Suburban Self Storage. See Expert Report at Tables 1-3. The Expert Report similarly assesses no allocation of responsibility for contaminant contribution to either Liberty Copper or Wire and MagneTek, Inc., the only prior owners and operators of the subject property included on U.S. EPA's Ellsworth Industrial Park Site PRP List.

Accordingly, because Lockformer's expert was unable to find any evidence that Suburban Self Storage should be allocated any responsibility for the alleged environmental impacts from the Ellsworth Industrial Park Site, we request that U.S. EPA reconsider Suburban Self Storage's prior written requests (dated October 9 and 22, 2002), to be removed from its Ellsworth Industrial Park Site PRP List.

EPA Region 5 Records Ctr.



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If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,



Robert K. Temple

RKT

Enclosure

cc: Mr. Mazin Enwiya (w/encl.)  
Mr. James Radlein (w/encl.)

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## EXPERT REPORT

This Expert Report discusses the contaminant contribution to the LeClareq Class Area by the following companies: Ames Supply Co., Allen Gear, Lindy Manufacturing, Magnatrol International, Moler Incorporated, Tripp Industries, Newsum, Flexible Steel, Arrow Gear Company, Dynagor, The Masty Corporation, Liberty Copper & Wire and Magnetek, Inc., Franklin Brand Products, Inc., White Lake Rolling Corporation, RHI Holdings, Inc. and the Fairchild Corporation, Pashow Piping Systems, Inc., William Helwig, Suburban Self Storage, Scott Incorporated, Principal Manufacturing Corporation. The above-described companies are referred herein as the Elmhurst Industrial District Third-Party Defendants (Defendants).

### Prepared By:

Ronald E. St. John, PEG, PG  
Clayton Group Services, Inc.  
3140 Flaming Road  
Downers Grove, IL 60515

September 25, 2003

Ronald E. St. John, PEG, PG

## I. INTRODUCTION

I have been asked by The Lockformer Company (Lockformer) to provide opinions regarding the nature and extent of groundwater contamination impacting the LeClercq Class Area, and to evaluate and identify the contribution of other sources of groundwater contamination occurring there, in connection with LeClercq v. The Lockformer Company, Case No. 00 C 7164 (The Litigation). In addition, Lockformer has asked me to provide opinions related to allocation and apportionment of responsibility for the groundwater contamination occurrence in the LeClercq Class Area.

## II. QUALIFICATIONS

I have been performing extent of contamination analyses and hydrogeologic investigations at hazardous waste sites for over 23 years. I am a licensed Professional Geologist in several states including Illinois. I am a Certified Professional Geologist (CPG) by the American Institute of Professional Geologists, as well as a certified Professional Hydrogeologist (PHG) by the American Institute of Hydrology. I have been employed for the last 18 years by Clayton Group Services, Inc. (Clayton) (or one of its predecessors), a national environmental consulting firm with 19 offices across the United States and over 550 employees. My current title with Clayton is National Director of Remediation Services. I have a B.S. in Geology from Southern Illinois University in Carbondale, Illinois. I performed graduate work in hydrogeology at Wright State University in Dayton, Ohio. My resume, documenting my qualifications, is provided as Appendix A.

I have directed firsthand all the soil and groundwater investigations at, and in the vicinity of, the Lockformer site since December 2000. I am fully knowledgeable of all environmental investigation data collected at the Lockformer site prior to my involvement in December 2000. I am the lead investigator identified to the Illinois Environmental Protection Agency (IEPA) in work performed under the Agreed Order executed with the Illinois Attorney General, and have the assignment of Project Coordinator identified under the unilateral 106 order between Lockformer and the United States Environmental Protection Agency (USEPA). As such, I personally have participated in or made all representations and interpretations regarding the nature of the investigation data to those agencies in technical discussions regarding this work, to date.

My resume includes a list of publications I have authored in the last 10 years. The only other case for which I have testified as an expert at trial or by deposition within the last four years is United States v. Pharmacia (f/k/a Monsanto Company) et al. where I was engaged as an expert by Praxair, Inc.

### III. ENGAGEMENT

Lockformer has asked me to take on this engagement because of my experience in the field, and my direct involvement in investigating the Lockformer site and surrounding areas as noted above. To fulfill my assignment as lead investigator, I have reviewed extensive technical information regarding the Lockformer site directly, and the surrounding areas. This work has included environmental site investigation reports, facility operational documents, the IEPA files on area facilities, regulatory agency correspondence, deposition and trial testimony, plaintiff reports and affidavits, and published information generally related to scientific matters. I have performed in-field investigations myself or have performed inspection of the investigations by others under my direction on many occasions.

In forming the opinions herein, I have considered all the information cited above. Additionally, I have considered the work identified in Section V as references. I reserve the right to supplement or modify this report and my opinions to respond to any new or additional information that may become available after the date of this report, and to rebut, as necessary, any opinions offered by the defense in this case.

For my involvement in this project, Clayton is compensated at the rate of \$ 165 per hour, and I have not received any further compensation for my services over and above that of my ordinary compensation provided by Clayton.

### IV. OPINIONS RELATED TO CONTRIBUTION

All of the opinions stated herein are based upon a reasonable degree of scientific certainty. It is my opinion that the Ellsworth Industrial District (Ellsworth) Defendants have contributed contamination involving the hazardous substances trichloroethene (TCE), tetrachloroethene (PCE), and 1,1,1-trichloroethane (TCA) to the LeClercq Class Area groundwater. This opinion has been formulated as a result of the following specific opinions:

1. **Each of the Ellsworth Industrial District Defendants used one or more of the hazardous substances involved in the groundwater contamination impacting the LeClercq Class Area.**

Based on information obtained from the IEPA, each of the Defendants have engaged in documented use of the hazardous substances TCE, PCE, and TCA at each of the Defendants' facilities (see Table 1). Additional details of the data obtained from the IEPA files, and the discovery taken in the Litigation were used to develop Table 1 and are provided in Appendix B.



In some instances, the IEPA files indicate that some of the Defendants manifested F001 and/or F002 wastes for disposal. (40 CFR Part 261.31 identifies other halogenated solvents besides TCE, PCE, and TCA in the F001 and F002 listing.) It is likely that these F001 and/or F002 wastes were the hazardous substances involved in this case since testing at the Defendants' facilities has predominantly determined the presence of these wastes and not the other halogenated solvents categorized in the F001 and/or F002 listing.

2. **Hazardous substances from each of the Defendants were discharged to the sanitary sewer system and the Downers Grove Sanitary District (DGSD), and it is likely that these discharges have occurred for many years.**

The sanitary sewer system from each of the Defendants' facilities discharges to the DGSD treatment plant facility in the northwest corner of Ellsworth (IEPA files).

Sampling and laboratory analyses performed by the DGSD on samples of the influent to the DGSD treatment plant indicate the presence of TCA and PCE. Sampling and laboratory analyses performed by the DGSD on samples of the sludge generated by the treatment plant indicate the presence of TCE, PCE, and TCA. Recent environmental investigations by the USEPA and the IEPA have indicated widespread soil and groundwater contamination by TCE, PCE, and TCA at industrial facilities within Ellsworth and in groundwater downgradient of Ellsworth in the Silurian dolomite aquifer for at least 2 miles. As a result, it is likely that these same Ellsworth industrial facilities are responsible for discharges to the DGSD containing TCE, PCE, and TCA.

Groundwater contamination involving TCE, PCE, and TCA in public water supply wells in and around the Ellsworth Industrial District was discovered when water sampling of these public water supply wells was first mandated by the USEPA and IEPA in the early 1980s (IEPA files). In fact, Well Site Survey reports for Downers Grove (April 1989), Belmont-Highwood (June 1992), and the Maple Hill Improvement Association (June 1992) developed by the IEPA Public Water Supply Division indicate the probable source of this contamination is Ellsworth. These reports also identify several of the Defendants' facilities by name. Documented usage of TCE by industry in Ellsworth dates to 1958, pre-dating operations at the Lockformer facility by 11 years. It is likely that discharges of TCE, PCE, and TCA from industrial facilities within Ellsworth to the DGSD have occurred for several decades.

3. **Hazardous substances were discharged from the DGSD wastewater treatment plant to the 42-inch effluent sewer that runs through the northern portion of the LeClercq Class Area.**

The DGSD has operated a 42-inch effluent discharge sewer from its treatment facility located in the northwest corner of Ellsworth since approximately 1954. This effluent discharge sewer runs through the northern portion of the LeClerc Class Area south of Lockformer and ultimately discharges to the East Branch of the DuPage River approximately 1.8 miles to the west of the DGSD facility. As of 1996, the DGSD discharged effluent flows of less than 30,000,000 gallons per day to this sewer, and when the capacity of the sewer was exceeded, the DGSD discharged the remaining effluent to St. Joseph Creek (DGSD letter to IEPA Permit Section, 1/10/96).

Effluent and sludge from the DGSD treatment plant have been historically discharged to lagoons south of St. Joseph Creek where the sludge has been available for public distribution (IEPA Inspection Report, 12/13/84). Recent groundwater monitoring well installation and sampling by the USEPA indicates that the effluent and sludge discharged to these lagoons have contaminated the groundwater there with TCE, PCE, and TCA (Phase II Site Assessment Report, Ellsworth Industrial Park, Downers Grove, Illinois; Prepared for USEPA, 8/02). It is likely that the groundwater contamination adjacent to these lagoons is representative of the effluent quality in historic discharges from the DGSD to the 42-inch effluent discharge sewer that flows through the northern portion of the LeClerc Class Area.

**4. Hazardous substances leaked from the DGSD 42-inch effluent sewer line in the northern portion of the LeClerc Class Area to groundwater.**

The DGSD effluent discharge sewer is known to have been in such a state of disrepair that, in 1996, the DGSD informed the IEPA they were considering the feasibility of discharging directly to St. Joseph Creek, and discontinuing the use of the effluent discharge sewer (DGSD letter to IEPA Permit Section, 1/10/96).

Video and written logs from camera surveys of the DGSD effluent sewer, and an employee of the DGSD have indicated that the integrity of the DGSD effluent sewer line has been compromised historically, and required maintenance due to tree roots intrusion into the sewer. Maintenance has included the removal of the tree roots from the effluent sewer system, and reconstruction of the manholes along that section of the effluent sewer between the DGSD property and where the effluent sewer line crosses St. Joseph Creek north of the LeClerc Class Area (FOIA file for DGSD).

Recent hydrogeologic investigations performed by Clayton have determined that an elevated water table condition is present on the Burlington Northern Santa Fe (BNSF) property south of Lockformer's property under the DGSD effluent sewer line and St. Joseph Creek. This condition in the water table is evidence that the DGSD sewer and/or St. Joseph Creek currently leak significant volumes of treated

sewage effluent or surface water into the subsurface to recharge groundwater in this area. It is likely that, prior to recent rehabilitation and reconstruction efforts, the DGSD effluent sewer leaked greater volumes of effluent than it does currently.

Recent soil sampling performed by Clayton in the vicinity of the DGSD effluent sewer on the BNSF property south of Lockformer and north of the LeClercq Class Area indicates the presence of PCE in soil under this sewer but above the water table. It is likely that the PCE concentrations determined to be present in these soils are the result of leaks from the DGSD effluent sewer. However, it is difficult to determine if the occurrence of this PCE contamination in these soils is from recent leaks or is a remnant of historic leakage.

Recent groundwater sampling from shallow and intermediate monitoring wells performed by Clayton in the vicinity of the DGSD effluent sewer on the BNSF property south of Lockformer and north of the LeClercq Class Area indicate the presence of the highest concentrations of TCA determined to date in the sand and gravel groundwater west of I-355. It is likely that this TCA groundwater contamination is due to recent leaks from the DGSD effluent sewer.

Chloride concentrations are regularly measured and used as corroborative indicators of groundwater contamination during groundwater studies. Chloride analyses collected from groundwater monitoring wells on the BNSF property adjacent to the DGSD effluent sewer and St. Joseph Creek support a conclusion that significant groundwater contamination has resulted from leakage occurring from the DGSD sewer or St. Joseph Creek directly south of the Lockformer site. The highest concentration of TCE in groundwater occurring in the bedrock north of the LeClercq Class Area occurs in groundwater monitoring well MW-2300D directly adjacent to the DGSD effluent sewer on the BNSF property south of the Lockformer site. The groundwater from this well also exhibits elevated concentrations of chlorides. As a result, it is likely that leakage from the DGSD effluent sewer and/or St. Joseph Creek has contributed to the contamination that exists in this well.

**5. Use of hazardous substances at each of the Defendants' facilities has resulted in soil contamination at their facilities.**

The USEPA and IEPA have performed environmental investigations in Ellsworth that were based on historical aerial photo analysis of surface drainage features including retention ponds, pits, and historical surface water diversion features; drum storage locations present; and storm sewer locations and outfalls. This analysis was followed up by soil sampling investigations to determine releases to these surface water migration pathways. These investigations determined widespread TCE, PCE, and TCA contamination of these surface water migration

pathways (Phase II Site Assessment Report, Ellsworth Industrial Park, Downers Grove, Illinois; Prepared for USEPA, 8/02).

6. **Direct discharge or runoff from each of the Defendants' facilities to surface water drainage ways have resulted in hazardous substances being released from those facilities to St. Joseph Creek.**

The headwaters of St. Joseph Creek originate in the vicinity of downtown Downers Grove. The creek flows west through Ellsworth and the northern portion of the LeClercq Class Area, south of Lockformer, and discharges to the East Branch of the DuPage River. Historic sampling of St. Joseph Creek indicates that the water in the Creek was contaminated due to the discharges from industrial sites in the area and exhibited elevated concentrations of TCE (IEPA files).

A Preliminary Assessment report performed by the IEPA in May 1987 to assess the cause of contamination in Downers Grove public water supply wells #6 and #8 attributes the probable source of contamination to "sloppy industry discharging organic solvents to surface water." Additionally, St. Joseph Creek is identified as a potential contributor for the public water supply well contamination in the Well Site Survey report for Downers Grove (April 1989) developed by the IEPA Public Water Supply Division. As a result of these findings, it is likely that hazardous substances released to surface water migration pathways by the Defendants in Ellsworth have migrated into the water of St. Joseph Creek.

7. **St. Joseph Creek has been contaminated by hazardous substances and has contributed to the groundwater contamination in the LeClercq Class Area.**

It is likely that TCE, PCE, and TCA contamination released at the industrial facilities within Ellsworth have migrated to St. Joseph Creek historically and, once in the water of the creek, have migrated into the northern portion of the LeClercq Class Area south of Lockformer. Based on the water level measurements from monitoring wells installed on the BNSF property south of Lockformer, and staff gage information related to the water surface of St. Joseph Creek along the BNSF property, St. Joseph Creek is an influent creek that loses water to the subsurface soils and contributes to recharge of the groundwater underneath it. As a result, it is likely that hazardous substances that have been released to surface water migration pathways within Ellsworth have migrated to St. Joseph Creek and been transported to the northern portion of the LeClercq Class Area and have leaked out of the creek to contaminate groundwater.

## V. OPINIONS RELATED TO ALLOCATION

Information gathered to date regarding hazardous substance use by the Defendants has, in large part, been obtained through freedom of information requests to the IEPA. Only limited access to the USEPA files on the Defendants has been available. The Defendants themselves have provided little information with respect to their hazardous substance use or handling at their facilities. However, after reviewing the facts related to the groundwater contamination contribution for the LeClercq Class Area, three reasonable bases for allocation have been identified, and presented below. These three allocation evaluations result in the Defendants and Lockformer having the following apportionment ranges: groundwater basis Lockformer 7%, Defendants 93%; per capita basis 6.66%; and duration of use basis Lockformer 10.89%, Defendants ranging from 0.33% to 14.52%.

### 1. Allocation on the basis of groundwater characteristics.

A review of the groundwater data at the south end of the Lockformer site, on the BNSF property under the DGSD effluent sewer line and in close proximity of St. Joseph Creek, and in the LeClercq Class Area, leads to the conclusion that other sources – not attributable to Lockformer – contributed to groundwater contamination in this area. Data that support this conclusion include:

- A. There exists an inconsistent chemical composition and concentration of chlorinated compounds affecting groundwater within the LeClercq Class Area compared with those chlorinated compounds effecting groundwater associated with the Lockformer site source areas.
- B. After exhaustive data collection efforts to date on the Lockformer site, there is no credible evidence to suggest that a Dense Non-Aqueous Phase Liquid (DNAPL) occurrence of TCE exists in the sand and gravel and/or bedrock groundwater as a result of releases on the Lockformer site.
- C. Groundwater contaminated with TCE appears to occur for approximately 2-1/2 miles south of the Lockformer property. The mass of contamination found in soil and groundwater on the south end of the Lockformer property is insufficient to have generated a groundwater contamination plume of this magnitude.

A consideration of the facts cited above leads to a conclusion that the DGSD pipeline and/or St. Joseph Creek is the source of this additional contaminant mass to the groundwater system between the Lockformer site and the LeClercq class area.

During the LeClercq and Mejdrech Class Area trials, plaintiffs' expert, Dr. Roy O. Ball, opined that a source of DNAPL must be present on the Lockformer site because not enough mass exists in the groundwater found at Lockformer to cause the downgradient groundwater contaminant plume he attributed to the site. After exhaustive data collection efforts to date on the Lockformer site, there is no credible evidence to suggest that DNAPL exists in the sand and gravel or the bedrock at the south end of the site. Discussions regarding this fact have been undertaken with the USEPA, the IEPA, and their consultant representatives from Weston and Parsons on multiple occasions. Recently, Stan Komperda (IEPA Project Manager) stated during deposition that he has not seen any evidence of a DNAPL existence in the sand and gravel or bedrock groundwater at the Lockformer site.

In developing his opinions for his expert report, Dr. Ball did not have available to him, and did not consider the data developed by Clayton related to the investigations of the DGSD effluent sewer and St. Joseph Creek on the BNSF property. In preparation for his May 2003 Expert Report supporting plaintiffs' claims in the Mejdrech Class litigation, Dr. Ball performed groundwater contaminant transport calculations to evaluate Lockformer's contribution to contaminant plume based on the data from the Lockformer site. At that time, data indicating contribution from the DGSD effluent sewer and/or St. Joseph Creek had not yet been developed. Dr. Ball's groundwater solute transport calculations indicated that, based on the data developed during the investigations of the Lockformer site, Lockformer's groundwater contamination could only account for approximately 7% of the contaminant mass observed in the LeClercq Class Area groundwater contamination plume. This suggests that the Defendants are responsible for 93% of the hazardous substances in the LeClercq Class Area groundwater.

Based on information available to date, there are two other equitable manners in which to allocate contribution for the additional shares. Besides the groundwater contamination basis of allocation, the other two ways to equitably allocate shares is to either distribute that contribution evenly across Lockformer and the Defendants (per capita basis), or apportion contribution based on years of hazardous substance use (duration of use basis). Table 2 identifies the contribution by each party if the apportionment is performed equally to all the parties that used the hazardous substances including, Lockformer. Table 3 identifies the contribution by each party based on the number of years each party used the hazardous substances involved in this case.

**2. Allocation on the basis of hazardous substances use by Defendants.**

At the time of this report, appropriate data are not available to make an equitable allocation of contribution based solely on the quantity of hazardous substance use

by the various parties. If more data regarding hazardous substance use by the Defendants become available, it is likely that an equitable contribution determination could be made.

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- Weston, 2002a. *Final Preliminary Groundwater Investigation Report, Downers Grove Groundwater Site, Downers Grove, DuPage County, Illinois*. Roy F. Weston, Inc., May 2002.
- Weston, 2002b. *Phase II Site Assessment Report, Ellsworth Industrial Park, Downers Grove, DuPage County, Illinois*. Weston Solutions, Inc. August 2002.

### **Illinois EPA Documents and Records**

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- IEPA, 1988. "Preliminary Assessment Site Investigation Program of Division of Land Pollution Control (DLPC)." January 13, 1988.
- IEPA, 1989. "Groundwater Quality Protection Program: Downers Grove." Facility Number 0430300 Well Site Survey Report. IEPA/PWS/89-075.
- IEPA, 1992a. "Groundwater Quality Protection Program: Belmont-Highwood." PWD Facility Number 0435180. IEPA/PWS/92-074.
- IEPA, 1992b. "Groundwater Quality Protection Program: Maple Hill Improvement Association." Facility Number 0435800. IEPA/PWS/92-077.

### **Published References**

USEPA, 2001. Historical Aerial Photographic Analysis, Lockformer Site, Lisle, IL.  
USEPA, Las Vegas, NV. July 2001.

**TABLES**

**TABLE 1**  
**Duration of Hazardous Substance Use**

Company Name	Duration of Hazardous Substance Use	
	Start Date	End Date
Ames Supply Co.	1987-2001	24
Arrow Gear Co.	1960-1995	35
Bison Gear (Fusibond)	unknown	unknown
Bison Gear (IPSCO)	pre1988-1989	1+
Dynagear, Inc.	1989	1+
Flexible Steel	1968-1993	25
Lindy Manufacturing Co.	1980-2003	23
Magnetrol International	1970-1990	20
Molox Inc. - Katrine Ave.	pre1982-1993	11+
Molox Inc. - Walnut Ave.	pre1991-1993	2+
The Morey Corp.	1984-1992	8
Precision Brand	1970-1978	8
Rexnord Corporation	pre1980-2003	23+
Scot, Inc.	1958-2002	44
Seatt Corporation	1982-1986	4
Tricon - Wisconsin St.	1983-2000	17
Tricon - Janes Ave.	1983-1990	7
Tricon - Chase Ave.	1985-2001	16
Tricon - Curtiss St.	pre1983-1984	1+

**TABLE 2**  
**Allocation to All Users Equally**

Company Name	Allocation Percentage
Ames Supply Co.	6.66%
Arrow Gear Co.	6.66%
Bison Gear (IPSCO)	6.66%
Dynagear, Inc.	6.66%
Flexible Steel	6.66%
Lindy Manufacturing Co.	6.66%
Magnetrol International	6.66%
Molex Inc. - Katrine Ave.	6.66%
The Morey Corp.	6.66%
Precision Brand	6.66%
Rexnord Corporation	6.66%
Soot, Inc.	6.66%
Seatt Corporation	6.66%
Tricon - Wisconsin St.	6.66%
Lockformer	6.66%

**TABLE 3**  
**Allocation Based on Years of Use**

Company Name	Years of Use	Years	Allocation
Ames Supply Co.	1987-2001	24	7.92%
Arrow Gear Co.	1960-1995	35	11.55%
Bison Gear (IPSCO)	pre-1988-1989	1	0.33%
Dynagear, Inc.	1989	1	0.33%
Flexible Steel	1968-1993	25	8.25%
Lindy Manufacturing Co.	1980-2003	23	7.59%
Magnetrol International	1970-1990	20	6.60%
Molox Inc. - Katrine Ave.	pre-1982-1993	11	3.63%
Molox Inc. - Walnut Ave.	pre-1991-1993	2	0.66%
The Morey Corp.	1984-1992	8	2.64%
Precision Brand	1970-1978	8	2.64%
Rexnord Corporation	pre-1980-2003	23	7.59%
Scot, Inc.	1958-2002	44	14.52%
Seatt Corporation	1982-1988	4	1.32%
Tricon - Wisconsin St.	1983-2000	17	5.61%
Tricon - Janes Ave.	1983-1990	7	2.31%
Tricon - Chase Ave.	1985-2001	16	5.28%
Tricon - Curtiss St.	pre-1983-1984	1	0.33%
Lockformer	1968-2002	33	10.89%

Total Years of Hazardous Substance Use By All Parties = 303

## **APPENDIX A**

### **Resume of Ronald B. St. John, PHG, CPG**

**Expert Report  
The Lockformer Company / Lisle, Illinois  
Expert Report-Lockformer / 9/29/2003 / RBS/BRS**



**Ronald B. St. John, PHG, CPG**  
**Vice President, National Director of Remediation Services**

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**Summary of Professional Experience**

Ronald B. St. John has over 22 years of experience performing hydrogeologic studies, and remediation efforts at hazardous waste sites. He has directed large-scale soil and groundwater investigations and remedial activities involving a variety of geologic settings including karst, hard rock, cyclothems, glacial drift, and metamorphic terrains. He is an expert in the occurrence, migration, transformation, and remediation of organic contaminants in soil and groundwater. His expertise includes modeling of soil and groundwater in support of remedial actions and alternative cleanup standards. He has managed large-scale projects involving the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and several state voluntary remediation and Brownfield program sites.

**Recent Project Experience**

*Area Wide Residential Well Contamination*

Mr. St. John is the Project Coordinator under a unilateral 106 order executed between the USEPA and Clayton's client and is Project Manager identified in an Agreed Order with the Illinois EPA executed on the same project. In these capacities, Mr. St. John has been responsible for the direction of investigation and remediation activities related to an area wide chlorinated solvent contamination (TCE, PCE, and TCA) involving residential wells up to 3-miles away from the client facility. Mr. St. John has directed all investigation and remediation activities performed to date include: defining the extent of soil and groundwater contamination related to releases at the industrial facility; identifying other sources of chlorinated solvent contamination in the Silurian Dolomite aquifer; developing a semi-regional groundwater flow map for the Silurian Dolomite; and implementing soil and groundwater remedial measures at or near the source areas on the industrial client's property. Additional responsibilities associated with the project have included the support of litigation activities associated with class action lawsuits, and personal injury lawsuits.

The remedial measures implemented to date at the site include the installation of a Electric Resistive Heating (ERH) system to address contaminated silty clay soils to a depth of 30 over approximately 2.5-acres at the site to reduce the chlorinated solvent concentrations to levels protective of human direct contact/inhalation. A lower sand and gravel that exists at depth of 30 to 60 feet in depth over approximately 5-acres of the site is being remediated through use of soil vapor extraction. The proposed groundwater remedial measures for the site will include a containment system in the glacial drift in the northern portion of the site and a biological reactive barrier in the southern portion of the site.

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*Steel Industry*

Mr. St. John has been serving as project manager for a Voluntary Remediation Program (VRP) site at this steel manufacturing facility in Indiana. The site also has review by the United States Environmental Protection Agency (USEPA) due to withdrawal of its Part A and consent decree with Region V. Mr. St. John has directed all investigation and remediation activities at the site. Constituents of concern are zinc, ammonia, chlorides, sulfate, cyanide, copper, lead, fluoride, and nickel. Widespread soil and groundwater contamination has resulted from process unit and sewer leaks and land disposal in a pit and three landfills.

A process unit containment testing and repair program has been implemented to abate future release. Approximately 50,000 feet of process sewer have been lined. One landfill has been capped and closed; the other two landfills are currently undergoing investigation and closure. The extensive groundwater contamination at the site has been characterized, and a groundwater remediation system consisting of 26 recovery wells has been installed. The groundwater remediation system currently recovers approximately 2,200 pounds of zinc per month. A site groundwater flow and solute transport model was developed to design the site's groundwater remediation system, predict dewatering from beneath the plant building, and develop surface water-derived groundwater protection standards under the risk assessment.

For a landfill and a quarry containing wastewater treatment sludges, an ecological risk assessment has been performed to develop a list of closure options available. Hydrologic modeling to evaluate the potential for scouring and adverse affects of closing the units in a floodplain has been performed in support of the remedial options evaluated.

*Automotive Industry*

Mr. St. John has directed soil and groundwater investigation and remediation activities for this RCRA Facility Investigation and Corrective Action at this campus of seven automotive manufacturing plants in Anderson, Indiana. Primary contaminants of concern are trichloroethene (TCE), tetrachloroethene (PCE), and 1,1,1-trichloroethane (TCA). Mr. St. John has performed or directed analytical and numerical flow, solute transport, and attenuation groundwater modeling to develop site remedial options and for use in site risk assessment. He recently conducted an evaluation of applicable remedial technologies for point sources of contamination and groundwater. Natural attenuation of the chlorinated solvents in groundwater at the site has been monitored, evaluated, and used in developing the site cleanup objectives.

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## **Expert Testimony**

### *Chemical Industry*

Mr. St. John reviewed all technical data developed for this site in a dispute over chlorinated solvent contamination (TCE, PCE, and TCA) of soil and groundwater. Based on his evaluations of contaminant occurrence and transport, Mr. St. John helped attorneys develop the case for their client, a major chemical company. He advised attorneys on the likely regulatory actions and on work and testimony performed by other experts.

### *Aircraft and Insurance Industries*

Mr. St. John provided expert testimony for a major insurance company regarding the nature, timing, and occurrence of chlorinated solvent (TCE) releases at an aircraft facility in Fullerton, California. Activities involved forming opinions after reviewing the investigation data and operational history for the site, and performing independent soil and groundwater modeling.

Unsaturated zone soil modeling, as well as groundwater flow and solute transport modeling, were performed to estimate or "back calculate" the timing of the contamination occurrence at the facility. This modeling, in conjunction with the site operational history, formed the basis of an expert opinion regarding the nature and occurrence of contamination at the facility. Mr. St. John also provided opinions regarding other experts' destruction of data.

### *National Priorities List (NPL) Site*

Mr. St. John provided an expert opinion regarding allocation of costs consistent with the National Oil and Hazardous Substances Contingency Plan (NCP) and the occurrence and migration of chlorinated solvents (TCE, PCE, and TCA) at this NPL site in Indiana.

### *Plating Industry*

Mr. St. John provided expert opinions, consistent with the NCP, regarding the performance of remediation work, sources of chlorinated solvent contamination contributing to groundwater contamination, and the effectiveness of the groundwater remediation implemented at this VRP site in Indiana.

### *Dry Cleaning Industry*

Mr. St. John directed an investigation to determine the nature and extent of PCE contamination in soil and groundwater at a dry cleaning facility in Indianapolis, Indiana. He is currently providing expert opinion regarding the origin of the contamination and the cost to perform remedial activities.

### *Abandoned Hazardous Waste Site*

Mr. St. John provided an expert opinion for a toxic tort suit regarding the fate and transport of waste disposed and stored at a site near Rockford, Illinois.

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**Ronald B. St. John, PHG, CPG****Page 4*****Underground Storage Tank (UST) Site***

Mr. St. John provided expert support for a malpractice litigation concerning a property transfer and removal and closure of a UST system at a facility in Chicago.

***Municipal Water Supply***

For a toxic tort lawsuit in Shelbyville, Indiana, Mr. St. John provided expert support involving birth defect citizen suits filed against contributors to the Shelbyville, Indiana water supply contamination.

**Other Project Experience****Source Study Design and Implementation*****Manufacturing Industry – Fiberglass***

As project manager, Mr. St. John was responsible for the design and implementation of a study to determine the source of TCE in a municipal water supply. The client was accused of contaminating the water because of its proximity to the well field.

Mr. St. John performed a passive soil gas monitoring survey over 4 million square feet of the aquifer to identify the source of contamination, and subsequently installed a line of groundwater monitoring wells from the suspected source to the City's well field. He identified a plume of PCE contamination emanating from a former electronic component manufacturing facility 3,000 feet upgradient from the client's facility. He determined that the PCE was anaerobically biodegrading into TCE while traveling through the aquifer prior to reaching the city well supply and represented the client in potentially responsible party (PRP) and regulatory negotiations and settlements.

Mr. St. John conducted a site investigation, feasibility study, and risk assessment of the fiberglass property under the Indiana Site Remediation Program and under an agreed order with the Indiana Department of Environmental Management (IDEM) to ensure that no contribution to the groundwater contamination had a source on site. He completed the work showing that the contribution to groundwater contamination from the fiberglass site was negligible. He received a signed agreed order of final resolution with IDEM on the site, the first of its kind in Indiana.

**Comprehensive Environmental Services*****Metals Industry – Finishing Operations***

Mr. St. John served as technical advisor for a facility with extensive onsite soil contamination from TCE, PCE, and TCA, where adjacent residential water supplies were in jeopardy. He designed and implemented a characterization study to determine the extent of groundwater contamination. Based on the data obtained, groundwater modeling was performed on the large thickness of the very transmissive alluvial aquifer to provide vertical discretization and insight into the necessary remediation system. He developed a groundwater remediation plan after model calibration and validation. He negotiated and received approval of the remedial plan from the state voluntary cleanup program.

**Ronald B. St. John, PHG, CPG****Page 5****Investigation and Remedial Action Design and Management*****Pharmaceutical Industry***

As project manager for a remedial investigation/feasibility study (RI/FS) at an NPL site, Mr. St. John's responsibilities included design of investigative and remedial efforts at a highly transmissive aquifer site contaminated to saturation with chlorinated solvents including PCE and TCA. He consulted with chemical engineers to design a large-scale groundwater supply and treatment system to provide an interim solution to local water supply problems. The groundwater characterization during the RI was completed in five months and identified three separate solvent plumes totaling approximately 4,000 feet in length. He supervised groundwater-modeling activities to provide data to the USEPA indicating that remedial systems design could be initiated. The USEPA approved a remedial alternative to the groundwater modeling and requested an expedited feasibility study to allow more rapid remedial action. After completion of the feasibility study, Mr. St. John developed a remedial design.

**System Design, Regulatory Approval, and Implementation*****RCRA Corrective Action Site***

Mr. St. John was the project manager responsible for design, coordination of regulatory approval, and implementation of a groundwater remediation system at this RCRA corrective action site. The remediation installed included a 660-foot-long, 26-foot-deep interception trench in glacial drift, bedrock groundwater recovery wells, and a treatment system consisting of air strippers and activated carbon units in series. Treated groundwater at the site is injected back into the bedrock at the site, and a soil flushing system is located under the transportation, storage, and disposal (TSD) facility building. The soil flushing system spreads the treated water through infiltration basins constructed on soils with high concentrations of chlorinated solvents including PCE, TCE, TCA, and ketones that resulted from former surface impoundments at the site.

Mr. St. John performed and directed soil and groundwater modeling efforts that resulted in proposed cleanup objectives for the site. These cleanup objectives were the first alternative soil cleanup levels approved for a RCRA site in Illinois. He performed groundwater modeling to design the remediation system and predict the behavior of groundwater contamination during the remediation. He determined various water budgets for a remediation system and predicted the duration of remediation for financial assurance purposes.

**Property Transfer Due Diligence*****Food Industry***

Mr. St. John performed the environmental due diligence assessment for this \$ 4 billion acquisition by a major grocery chain. Project activities included the assessment of environmental costs associated with properties containing dry cleaning operations, gasoline stations, and bulk terminal trucking operations. Evaluations included cost projections for investigation and remediation of contamination and predicting regulatory outcomes for properties involved with the various state voluntary remediation programs.

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**Ronald B. St. John, PHG, CPG****Page 6****Data Analysis, Modeling, and System Design*****NPL Site***

Mr. St. John was responsible for analyzing hydrogeologic data, supervising flow and particle tracking modeling, and designing groundwater remedial systems under the remediation design/remediation action (RD/RA) at this Oklahoma NPL site. The project included the design of a 6,000-foot-long, whole-site groundwater containment system for a light, nonaqueous-phase liquid (LNAPL) recovery system, and a groundwater bioremediation system.

**RI/FS Technical Oversight*****Municipal Landfill NPL Site***

Mr. St. John provided technical oversight of the RI/FS at the MIG/DeWane NPL site in Belvidere, Illinois. The site is a former municipal landfill that has contaminated the limestone aquifer below it with chlorinated solvents.

**Hydrogeologic Consultation*****Electronics Industry***

Mr. St. John provided hydrogeologic consultation to the USEPA at the first RCRA Corrective Action site in the country. The work involved oversight of an electronics component manufacturer involved in extensive site characterization and remediation of chlorinated solvents (TCE, PCE and TCA) in soils and groundwater. Mr. St. John worked with members of the United States Geological Survey (USGS) to oversee groundwater flow modeling of the site and to create an accurate hydrogeologic site depiction.

**Onsite Emergency Response Management*****Trucking/Transportation Industry***

Mr. St. John was the onsite emergency response manager for a trucking fleet facility that had lost 3,000 gallons of gasoline from a UST located adjacent to an underground garage. Gasoline seeping into foundation walls of the garage caused an explosion and an explosive atmosphere at the facility. Mr. St. John designed a system with horizontally installed well points hot-tapped through the garage wall to relieve explosive conditions. He used secondary and tertiary techniques to recover gasoline and avoid long-term potential for explosive conditions.

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**Ronald B. St. John, PHG, CPG****Page 7****Contamination Extent Determination and Remediation Implementation*****Manufacturing Industry – Office Supply Products***

Mr. St. John was project manager for a site where extensive methylene chloride soil and groundwater contamination resulted from a leaking tank and destroyed all the polyvinyl chloride (PVC) drainage piping at the facility. He determined the extent of soil and groundwater contamination and implemented groundwater remediation measures, including installation of recovery wells and treatment systems, and soil vacuum extraction. A grout curtain was installed through electronic cone penetrometer boreholes that first characterized the stratigraphic sequence and identified zones of coarse-grained lithologies that were targeted for grout injection. The source area was remediated by six-phase electric heating of the soil and groundwater.

**Employment History**

Clayton Group Services, Inc. – Downers Grove, Illinois  
Vice President, Director, Environmental Services, Midwest Region  
1995 to Present

Mittelhauser Corporation – Naperville, Illinois (acquired by Clayton Group Services in 1995)  
Vice President, Midwest Operations  
1985 to 1995

Ecology & Environment, Inc. – Chicago, Illinois  
Geotechnical Manager  
1984 to 1985

Ecology & Environment, Inc. – Chicago, Illinois  
Senior Staff Hydrogeologist  
1981 to 1984

Illinois Environmental Protection Agency – Springfield, Illinois  
Hydrogeologist  
1980 to 1981

Baker Industries – Woodward, Oklahoma  
Drilling Engineer  
1979 to 1980

Dresser Industries – Houston, Texas  
Drilling Engineer  
1978 to 1979

Ronald B. St. John, PHG, CPG

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### Education

B.S., Geology, 1979  
Southern Illinois University, Carbondale, Illinois

Graduate Studies, Hydrogeology  
Wright State University, Dayton, Ohio

### Professional Registrations and Certifications

Professional Hydrogeologist (PHG), American Institute of Hydrology, PHG No. 1523  
Certified Professional Geologist (CPG), American Institute of Professional Geologists,  
CPG No. 7144  
Registered Professional Geologist, State of Arkansas, PG No. 484  
Registered Professional Geologist, State of Florida, PG No. 1060  
Licensed Professional Geologist, State of Illinois, PG No. 196-000230  
Licensed Professional Geologist, State of Indiana, CPG No. 674  
Registered Professional Geologist, State of Kentucky, PG No. 73  
Certified Professional Geologist, State of North Carolina, CPG No. 944  
Registered Professional Geologist, State of Wisconsin, PG No. 706  
Licensed Professional Geologist, State of Kansas, PG No. 577  
OSHA 40-Hour Hazardous Waste Operations and Emergency Response Training  
OSHA 8-Hour Refresher Training, Annual  
CPR/First Aid

### Professional Affiliations

International Association of Hydrological Sciences, Member No. 5780

### Publications and Presentations

- St. John, Ronald B. 2000. *Experience and Cost of Implementing Advanced Remedial Technologies Involving Chlorinated Solvents in Groundwater*. Air & Waste Management Association Conference. Salt Lake City, Utah.
- St. John, Ronald B. 2000. *Experience and Cost of Implementing Advanced Remedial Technologies Involving Chlorinated Solvents in Groundwater*. Pacific Environmental Restoration Conference. Honolulu, Hawaii.
- St. John, Ronald B. 1997. *RCRA Corrective Action - Laidlaw Environmental Services, Inc./Pecatonica, Illinois*. Presented at the 40th Annual Meeting of AEG in Portland, Oregon.



Ronald B. St. John, PHG, CPG

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St. John, Ronald B. 1981. *A hydrogeologic study of the Pembroke/Cross Brothers site.* State of Illinois Environmental Protection Agency Division of Land/Noise Pollution Control, p. 74.

St. John, Ronald B. 1981. *A preliminary hydrogeologic investigation in the northern portion of Dead Creek and vicinity.* State of Illinois Environmental Protection Agency Division of Land/Noise Pollution Control, p. 102.

## **APPENDIX B**

### **Hazardous Substance Use by Defendants**

Expert Report  
The Lockformer Company / Lisle, Illinois  
Expert Report-Lockformer / 9/29/2003 / RBS/BRS

**AMES SUPPLY COMPANY, 2537 Curtiss Street, Downers Grove**

- Ames leased the facility from White Lake Building Corporation from 1962 to 2001 and was the sole tenant (Weston Phase II Report).
- A solvent degreaser was present in the building (Weston Phase II Report).
- Based on disposal information, Ames used chlorinated solvents between 1987 and 2001.
- The 1987 Annual Hazardous Waste Report filed with the IEPA indicated they generated 100 gallons of waste 1,1,1-trichloroethane (based on IEPA files produced via FOIA: TPI07714-07716). The Downers Grove Fire Prevention files for the facility contained a MSDS for trichloroethene (produced via FOIA: TPI03651; TPI03643-03645).
- Based on records produced in response to the Attorney General subpoena, Ames purchased 20 1-gallon containers of trichloroethene in February, April, June, and August 2000 (TPI00413-00416). Ames purchased 23 gallons of Chemlok which contains 35 % TCE between 1998 and 2000 (TPI00398-00400)
- On February 20, 2001, Ames Supply disposed of a drum of 1,1,1-trichloroethane (TPI00435).
- Previous activities: Phase I Site Assessment (EGSL, 2000), a Phase II (EGSL, 2001), a Phase II hydrogeologic investigation was conducted in December 2001 (EGSL, 2001) with follow-up investigation work conducted in early 2002 (Weston Rpt). Soil borings from the EGSL Phase II investigation indicated the presence of 1,1,2,2-tetrachloroethane, PCE and TCE (Weston Phase II Rpt).
- Weston installed ten shallow groundwater-monitoring wells. MW-3 was found to contain 1,1-dichloroethane, cis-1,2-dichloroethene, PCE, 1,1,1-trichloroethane, and TCE at a depth of 17 to 27 feet bgs. Groundwater flow direction in the shallow saturated zone was determined to be southwesterly (Weston Phase II Report).

**ARROW GEAR COMPANY, 2301 Curtiss Street, 5240 Belmont Road,  
Downers Grove**

- Used TCE in vapor degreasers from 1960 to 1995 (USEPA 104e response).
- Baron Blakeslee delivered trichloroethylene, also described as Blacosolv Solvent, from 1968 through 1994. Deliveries were made by Baron Blakeslee from four to six times a year with three to five drums per delivery. An internal document states that a leaking drum of TCE was delivered to the facility and had to be returned to the vendor (based on documents produced to Attorney General).
- Based on a traveling requisition maintained by Arrow Gear, a total of 17,435 gallons of TCE were purchased between 1968 and 1994.
- According to the IEPA's computer database, Arrow Gear manifested 1,997 gallons of F001 (spent halogenated solvents from degreasing) and F002 (spent halogenated solvents) waste between May 1992 and November 1992.
- An anomalous letter was sent to IEPA alleging the dumping of TCE behind the building from the 1970's until 1987 (IEPA Document Production: 33575). The letter claims that the maintenance foreman, Ernie D. Kauzlarich, gave orders to dump it there.
- According to a December 13, 1985 internal memo, the facility was unaware that drums of hazardous waste could only be stored for 90 days and the memo states that this regulation has not been complied with in the past (IEPA Doc. Prod.: 29701).
- The 1992 Annual Hazardous Waste Report filed with the IEPA indicated 715 gallons of trichloroethene was generated (TPI09367). However, only 171 gallons were shipped offsite to Baron Blakeslee (based on IEPA files produced via FOIA).
- Arrow Gear emitted as much as 94 tons of TCE to the atmosphere between 1968 and 1995 with a maximum of 6.09 tons in 1991. The emissions are based on the amount of TCE purchased minus the amount of waste TCE shipped offsite.
- The Weston Phase II found TCE at 840 ppb in soils along a sewer that outfalls to St. Joseph Creek, indicating that TCE was discharged into the sewer (Weston Report, page 4-19). TCE and PCE concentrations in groundwater in the glacial drift exceeding the MCL and GRO were detected at several locations on the property (Weston Report, page 4-29).

- The facility has been discharging under NPDES permit to St. Joseph Creek since prior to 1971. Historically, the discharge was not tested for VOCs (IEPA Doc. Prod.).

## **BISON GEAR, 2615 Curtiss St., Downers Grove**

- Bison Gear was previously located at 2615 Curtiss Street. This facility was constructed in 1959. The facility at 2615 Curtiss Street is now occupied by Fusibond Piping Systems. The IEPA does not have any file information for 2615 Curtis Street (FOIA Response).
- The Weston Phase II report found PCE, TCE, and 1,1,1-TCA in shallow soil and groundwater between the Fusibond facility and the east adjacent Ames facility (Weston Phase II Report). The PCE and TCE concentrations in the groundwater exceed the Class I GROs.

**BISON GEAR, 2424 Wisconsin Ave., Downers Grove**

- Bison Gear occupied a facility at 2424 Wisconsin Avenue between 1977 and 1997. The building is currently occupied by International Piping Services Co. (IPSCO) (FOIA Response).
- Based on the Downers Grove Industrial Park Survey conducted by the IEPA Des Plaines field office in August and September 2001, Bison Gear was a former occupant of a facility located at 2455 Wisconsin Avenue (IEPA Document Production: 34098).
- According to an April 26, 1988 internal memorandum, Bison Gear was reviewing alternate methods for parts cleaning to eliminate the use of 1,1,1-trichloroethane or "Bison Mix" for the Wisconsin Avenue facility (IEPA FOIA Response: (TPI00951).
- According to the IEPA's computer database, IPSCO manifested 660 gallons of F001 waste (spent halogenated solvents from degreasing) on January 27, 1989 (IEPA FOIA Response).
- According to records produced in response to the Attorney General's subpoena, Beaver Oil pumped an oil/water mixture from multiple locations including an overspill tank, catch basin, pits, tanks, vats, and within a dike surrounding tanks located outside (TPI00804-00920).

**DYNAGEAR, INC., 2500 Curtiss Street, Downers Grove**

- Based on aerial photographs, facility was constructed between 1980 and 1986. St. Joseph Creek originally looped across the building footprint but was rerouted prior to construction of the facility.
- According to the Site Assessment Work Plan prepared by Weston for the Downers Grove Groundwater Investigation in January 2002 for the USEPA, Dynagear generated approximately 1,059 gallons of F001 waste in 1989 (IEPA Document Production: 35646).
- IEPA conducted an inspection on June 12, 1998 to follow-up on complaint filed with the DuPage County Solid Waste Department by the DuPage County Department of Environmental Concerns, Stormwater Management Division. According to the complaint, during the cleaning of St. Joseph Creek, the County's contractor witnessed a tray containing cutting oil drippings being dumped into the Creek by an individual on the Dynagear property during the week of May 4, 1998. The follow-up inspection did not reveal any evidence to substantiate the complaint, although the IEPA inspector did observe two large dumpsters containing steel shavings and gear cutting oil drippings, both of which were equipped with drip pans at the rear of the facility (north side) closest to St. Joseph Creek (IEPA FOIA Response).
- Based on the Downers Grove Industrial Park Survey conducted by the IEPA Des Plaines field office in August and September 2001, Dynagear was a former occupant of a facility located at 5200 Thatcher Road (IEPA Document Production: 34048).



**FLEXIBLE STEEL LACING CO., 2525 Wisconsin Avenue, Downers Grove**

- Flexible Steel has owned and operated the facility since 1967.
- Flexible Steel operated a trichloroethene vapor degreaser between 1968 and 1993. The vapor degreaser was located in the Tool Application Department within the southeast corner of the original manufacturing building. The trichloroethene resided in a concrete pit beneath the vapor degreaser. Raw trichloroethene was stored in a Baron Blakeslee-owned 250-gallon bulk storage tank that was hard-piped to the vapor degreaser. The bulk storage tank was filled via a hose fed by a Baron Blakeslee tank truck that parked in the loading dock located approximately 20 to 30 feet from the bulk storage tank. Spent trichloroethene was pumped into 55-gallon drums and stored in the heat treating department until the drums were picked up by Baron Blakeslee (information provided by Bill Amann in a May 21, 2001 deposition taken by Chuhak & Tecson).
- After the vapor degreaser was dismantled in 1993, the concrete pit was cleaned and filled with concrete. No soil testing was conducted to investigate whether trichloroethene may have impacted the surrounding soils (Bill Amann May 21, 2001 Deposition).
- According to Annual Hazardous Waste Reports filed with the IEPA for calendar years 1982 to 1986, the facility generated between 550 gallons and 880 gallons of waste trichloroethene per year (IEPA FOIA Response, TPI07529-07561).
- According to the IEPA's computer database, Flexible Steel manifested 10,334 gallons of F001 waste (spent halogenated solvents from degreasing) between October 1980 and November 1992 (IEPA FOIA Response). According to waste manifests, a total of 13,769 gallons of TCE was shipped offsite between 1980 and 1993 (produced to Attorney General, TPI12373-02439).
- A 1996 air permit limited the air emissions for any single hazardous air pollutant to 10 tons/year (IEPA FOIA Response, TPI03593-03595).

**LINDY MANUFACTURING COMPANY, 5200 Katrine Avenue, DG**

- The facility has a solvent degreaser and uses TCE. The clean TCE is stored in a 250-gallon tank, which is filled by their supplier (Weston Phase II).
- Based on Lindy's 104(e) response, they have used approximately 100 gallons of TCE annually since 1996, and between 100 and 200 gallons annually prior to 1996. Based on this admission, Lindy has purchased approximately 3,000 gallons of TCE since 1980 (150 gallons/year between 1980 and 1996, and 100 gallons/year since 1996).
- Bill of Lading dated September 13, 2000 documents the delivery of four drums of trichloroethylene by Coleman Chemical Inc. of Channahon, Illinois (LINDY0004).
- Lindy completed IEPA Special Waste Disposal Application dated February 6, 1980 for a waste stream characterized as Trichloroethylene and Oil, with a total annual waste volume of 1,000 gallons. The waste hauler is Baron-Blakeslee (FOIA Response).
- According to the IEPA's computer database, Lindy manifested 580 gallons of F001 waste (spent halogenated solvents from degreasing) between August 1990 and January 1992. All of the F001 waste was picked up by Baron Blakeslee (FOIA Response).
- A waste manifest dated June 12, 1980 for 165 gallons of "Tryclor and Oil" with Baron-Blakeslee listed as the waste hauler and disposal site (LNDY050).
- A Bill of Lading for three drums of waste trichloroethylene picked up by Coleman Chemical, Inc. on September 20, 1994 and delivered to Waste Research and Reclamation in Eau Claire, Wisconsin (LNDY062).
- A drainage way used to run behind (west of) Lindy towards St. Joseph Creek (Weston Phase II).
- The Weston Phase II report found 111-TCA in shallow soil at 19 mg/kg. Additionally, TCE was detected in the same sample at 0.14 mg/kg. According to the Weston Phase II Report, the results indicate a potential 111-TCA source at or near the Lindy property (Weston Report, page 4-22).

**MAGNETROL INTERNATIONAL INC., 5300 Belmont Road,  
Downers Grove**

- Magnetrol has owned and operated the facility since 1960.
- Magnetrol used TCE from the 1970s to 1990, according to a response to the Attorney General (TPI01381).
- A 475-gallon trichloroethene AST was operated between 1980 and 1990, and was removed in 1990 (104e response).
- The Downers Grove Fire Prevention files for the facility included a facility drawing that shows a 475-gallon trichloroethene aboveground storage tank (AST) located outside the east side of the building, and a supply line from the tank to a 275-gallon vapor degreaser located inside the facility. The facility drawing also shows multiple 5-gallon 1,1,1-trichloroethane satellite tanks and a solvent room located in the southwest corner of the building (FOIA Response).
- According to the Downers Grove Industrial Park Survey conducted by the IEPA Des Plaines field office in August and September 2001, there are two storm sewers on the east side of the building (IEPA Document Production: 33953).
- Annual Hazardous Waste Reports filed with the IEPA for calendar years 1982 through 1985 documented between 450 gallons and 2,050 gallons of waste trichloroethene being generated on an annual basis. After calendar year 1985, the volume of waste trichloroethene generated decreased to between 250 gallons and 688 gallons during calendar years 1986 through 1990. After calendar year 1990, waste trichloroethene was no longer listed on the annual hazardous waste reports (IEPA FOIA Response: I07563-07626).
- According to Annual Hazardous Waste Reports contained in the IEPA files, waste 1,1,1-trichloroethane was generated at the facility between calendar years 1983 and 1991. The annual volume generated ranged from 100 gallons to 1,870 gallons (documents produced via FOIA).
- According to the IEPA's computer database, Magnetrol manifested 9,990 gallons of F001 waste (spent halogenated solvents from degreasing) and F002 waste (spent halogenated solvents) between May 1983 and July 1992 (FOIA Response).
- According to EPA Form R reports, Magnetrol released the following quantities of trichloroethene to the atmosphere (documents produced to Attorney General TPI01708-1750): 1987: 8,800 lbs.; 1988: 4,400 lbs.; 1989: 4,900 lbs.; 1990: Not reported. The facility is limited to 25 tons/year according to the USEPA website.

- According to a purchasing ledger, Magnetrol purchased 21,408 lbs. of TCE in 1988 and 22,915 lbs. of TCE in 1989 (documents produced to Attorney General).
- According to an October 29, 1985 Contingency Plan prepared by Magnetrol, tetrachloroethene is stored at the facility (documents produced to Attorney General: TPI07667-07687).

**MOLEX INC., 5224 Katrine Ave., Downers Grove**

- The Katrine Avenue facility was constructed in 1964 (IEPA FOIA Response: TPI04342, TPI05474).
- According to the Site Assessment Work Plan prepared by Weston for the Downers Grove Groundwater Investigation in January 2002 for the USEPA, Molex used TCE and generated F001 waste (IEPA Document Production: 35648).
- In the comment section in the 1982 Annual Hazardous Waste Report, Molex stated that they annually use 220 gallons of 1,1,1-trichloroethane for degreasing purposes at the Katrine Avenue facility. However, Molex further stated that no waste is generated because the chemical evaporates when used (IEPA FOIA Response: TPI05405-7).
- According to the IEPA's computer database, Molex manifested 453 gallons of D039 waste (characteristic for tetrachloroethene) and F002 waste (spent halogenated solvents) between May 1991 and October 1992 (FOIA Response).
- According to the Weston Phase II Report, a drainage way used to run from the north side of the Molex facility (Katrine facility) towards St. Joseph Creek (Weston Report, page 2-7). The Weston Phase II found 111-TCA in shallow soil just north of the Molex facility at 19 mg/kg. Additionally, TCE was detected in the same sample at 0.14 mg/kg. According to the Weston Phase II Report, the results indicate a potential nearby 111-TCA source (Weston Report, page 4-22).

**MOLEX INC., 5225 Walnut Ave. Downers Grove**

- The Walnut Avenue facility was constructed in 1988 (IEPA FOIA Response: TPI04342, TPI05474).
- According to the Site Assessment Work Plan prepared by Weston for the Downers Grove Groundwater Investigation in January 2002 for the USEPA, Molex used TCE and generated F001 waste (IEPA Document Production: 35648).
- According to the IEPA's computer database, Molex manifested 653 gallons of D039 waste (characteristic for tetrachloroethene) and F002 waste (spent halogenated solvents) between February 1991 and January 1993 (FOIA Response).
- The Walnut facility had a leaking mineral spirits UST, but no samples were analyzed for VOCs upon completion of soil remediation (Weston Phase II Report, page 2-7).

**MOREY CORPORATION, 2659 Wisconsin Avenue, Downers Grove**

- Morey Corp. owned and operated the facility between 1967 and 2000 and used the solvents TCE and PCE (FOIA Response).
- According to the USEPA website, the facility had an air permit that limited emissions of volatile organic compounds to 0.3 tons/year.
- According to the IEPA's computer database, Morey Corp. manifested 2,867 gallons of F001 waste (spent halogenated solvents from degreasing) and F002 waste (spent halogenated solvents) between November 1984 and August 1992. Most of the waste was picked up by Baron Blakeslee (FOIA Response).
- The facility had a room for storing waste cleaning solvents with a floor drain that discharged to the ground outside the building. The soil below the discharge pipe was contaminated by tetrachloroethene and trichloroethene and associated degradation compounds including cis-1,2-dichloroethene, trans-1,2-dichloroethene, and vinyl chloride. Tetrachloroethene concentrations in the soil ranged from 0.16 to 110 mg/kg, and trichloroethene concentrations ranged from 0.019 to 8 mg/kg (FOIA Response: TPI02848-03001).
- According to IEPA files obtained through a FOIA Request, Pioneer Environmental was successful in getting a focused NFR letter (February 14, 2001) through the IEPA Site Remediation Program for a 100 by 120-foot area that includes the waste solvent storage room and discharge pipe through a Tier 2 evaluation.

**PRECISION BRAND, 2250 Curtiss Street, Downers Grove**

- DuPage Manufacturing used TCE and PCE for degreasing.
- TCE was used from 1970 to 1978, and PCE from 1978 to 1979.
- The solvent was originally delivered in drums, and later by tank truck to a 500-gallon AST inside the building.
- A recycling still was installed in 1976.
- Former employee of DuPage Manufacturing (Ms. Rita Torrez) stated that she and other staff used 5 gallon buckets of TCE and mops to clean the floor and equipment. Ms. Torrez claimed that some of the staff dumped the used TCE into a sump pump pit located just inside the dock doors located on the south side of the facility. The sump pump pit was located at the base of a depressed loading dock. She also stated that a TCE degreasing vat was located at the back of the facility, and that Precision Steel also used TCE.
- According to two cost quotations from plumbing contractors dated in August and September of 1971, the degreaser was going to be relocated, and piping would be installed to pump the waste from the degreaser into the sanitary sewer.
- The Weston Phase II investigation detected elevated levels of TCE (up to 17 mg/kg) in soil boring advanced along the west side of the facility near where an outlet pipe was observed and where degreaser operations may have occurred inside the building (Weston Report, page 4-17). In addition, elevated levels of TCE were detected in shallow groundwater.



**REXNORD CORPORATION, 2400 and 2324 Curtiss Street, Downers Grove**

- Rexnord has operated at the 2400 Curtiss Street facility since the 1950's or 1960's.
- The facility began using a vapor degreaser in 1989 for the purposes of cleaning partially assembled bearings according to documents produced to the Attorney General (TPI02448-49). The facility used 1,1,1-trichloroethane in their vapor degreaser from 1989 until mid-1993, and then switched to trichloroethene from mid-1993 until the present. The waste trichloroethene is stored in drums in the "Chip Shed," according to Mr. Fuys, Plant Metallurgist and Environmental Affairs Manager.
- Rexnord purchased 50 drums of TCE between 1994 and 2001 according to invoices produced to the Attorney General (TPI02497-02582).
- According to the 1982 Annual Hazardous Waste Report filed with the IEPA, Rexnord shipped 47,000 gallons of a waste stream description "Solvent, Coolant, Oils and Water" with hazardous waste codes D006 and F002 (spent halogenated solvents) (IEPA FOIA response).
- According to waste manifests produced to the Attorney General, Rexnord shipped 460 gallons of 111-TCA between 1991 and 1993 (TPI02476-02481).
- According to the Annual Hazardous Waste Reports filed for calendar years 1993 through 2000, a total of 777 gallons of spent trichloroethene from degreasing operations was shipped offsite for disposal (documents produced to Attorney General: TPI02450-57).
- According to the IEPA's computer database, Rexnord manifested 3,650 gallons of F001 waste (spent halogenated solvents from degreasing) and F002 waste (spent halogenated solvents) between June 1984 and March 1991. Most of the waste was picked up by Baron Blakeslee (IEPA FOIA response).
- According to the 1988 Annual Hazardous Waste Report filed with the IEPA, Rexnord shipped 25 gallons of a waste carrying the waste code F001 (spent halogenated solvents from degreasing) with the frequency generated of "Recurrent" circled (IEPA FOIA response: TPI08851)
- Rexnord emitted at least 5.66 tons of TCE to the atmosphere between 1997 and 2000 with a maximum of 2.1 tons in 1997. The emissions are based on the documents produced to the Attorney General.

- The Weston Phase II report found PCE in shallow soil ranging from 1 mg/kg to 9.5 mg/kg (Weston Phase II Report). Additionally, shallow groundwater in this same area had PCE and TCE concentrations exceeding the MCL and GRO. According to the Weston Report, the elevated levels in shallow soil and groundwater indicated that a nearby source of solvent contamination is present at the facility.

**SCOT, INC., 2525 Curtiss Street, Downers Grove**

- Scot filed a Notification of Regulated Waste Activity Form on December 5, 1990 indicating they generate F001, F003, and F005 wastes (TPI05061-62). An amended notification was filed on September 8, 1994 indicating they generate F002, F003, F005, D018, D028, and D040 waste. The notification was amended again on August 3, 2000 and indicated they generate F001, F002, F003, F005, D006, D007, D008, and D011 waste.
- According to Weston's Phase II report, the IEPA has information that indicates this facility has used chlorinated solvents since 1958. Additionally, the report states that the USEPA has information that a solvent degreaser was used in the 1970s (Page 2-9).
- According to the IEPA's computer database, Scott manifested 275 gallons of F002 waste (spent halogenated solvents) on September 9, 1983. The waste was picked up by American Waste.
- Based on the Downers Grove Industrial Park Survey conducted by the IEPA Des Plaines field office in August and September 2001, Scot formerly used TCE (IEPA Document Production: 33993).
- According to a Phase I ESA conducted for the facility in 2000, the facility had a storage room with a patched drain in the center of the room which led out to the west side of the building where it discharged directly onto surface soil (Weston Phase II Site Assessment Report, Page 2-9).
- The Weston Report detected elevated concentrations of PCE in shallow soil ranging from 4.5 mg/kg to 120 mg/kg.

**SEATT CORPORATION, 2464-2478 Wisconsin Ave. and 2820  
Thatcher Rd., Downers Grove**

- According to waste manifests obtained via a FOIA request to the IEPA, in 1983 Seatt disposed of 28 drums of solvent waste with various names including Blanco-Tron, Blanco-Tron Trichloroethylene, Blanco-Trichloroethylene, and Blanco-Tron TMST. In 1984, Seatt disposed of 6 drums of trichloroethylene, 6 drums of Blanco-Tron Trichloroethane, and 4 drums of F001 waste.
- In 1985, Seatt disposed of 5 drums of fluorinated waste.
- According to the IEPA's computer database, Seatt manifested 4,860 gallons of F001 waste (spent halogenated solvents from degreasing) between September 1982 and February 1986.
- According to a July 1985 Chemical Waste Contingency Plan prepared by Seatt, the types of hazardous waste generated at 2464 Wisconsin Avenue included freon, trichloroethylene, rosin flux-thinner, and methylene chloride.

**TRICON INDUSTRIES, 2325 Wisconsin Avenue, Downers Grove**

- The Wisconsin Street facility operated a Phillips Degreaser. The degreaser had an operating rate of 0.0012 tons (2.4 pounds) PCE per hour (makeup solvent). The degreaser operated on average 12 hours per day, 5 days a week, 52 weeks per year (FOIA Response). The Wisconsin Street facility also used TCE for degreasing in the past (more than 10 years ago), according to Larry Mc Daniel (IEPA Document Production: 34091).
- Tricon produced purchasing records for PCE to the Attorney General for the timeframe June 1994 to January 2001. A total of 79 drums of PCE were purchased during this timeframe.
- According to waste manifests produced to the Attorney General, 125 drums of spent PCE and 7 drums of 1,1,1-TCA were shipped offsite from the Wisconsin Avenue facility between March 1983 and February 2000.
- According to the IEPA's computer database, Tricon manifested 1,882 gallons of F001 waste (spent halogenated solvents from degreasing) and F002 waste (spent halogenated solvents) between April 1984 and March 1989.
- According to TRI Form R reports (USEPA website) and Annual Emission Reports, Tricon has discharged over 50 tons of PCE between 1987 and 2000.

**TRICON INDUSTRIES, 5000-5014 Chase Street, Downers Grove**

- Tricon produced purchasing records for PCE to the Attorney General for the timeframe June 1994 to January 2001. A total of 65 drums of PCE were purchased during this timeframe.
- According to waste manifests produced to the Attorney General, 83 drums of spent PCE and 1 drum of spent 1,1,1-TCA were shipped offsite from the Chase Avenue facility between May 1985 and February 2001.
- According to Annual Emission Reports filed with the IEPA for 1992, 1994, and 2000, Tricon discharged 5.341 tons of PCE to the atmosphere.

**TRICON INDUSTRIES, 2211 Curtis Street, Downers Grove**

- According to waste manifests produced to the Attorney General, two drums of spent PCE shipped offsite in June 1983.

**TRICON INDUSTRIES, 5400-5408 Janes Avenue, Downers Grove**

- According to the Weston Phase II Report, waste manifests between 1983 and 1990 indicate that the facility generated both TCE and PCE waste (Page 2-10).
- According to the Weston Phase II Report, the Janes Avenue facility was formerly occupied by Principal Manufacturing Company, another documented TCE user (Weston Report, page 2-10).
- The Weston Phase II report found TCE in shallow soil ranging from 220 mg/kg to 500 mg/kg at the Janes Avenue Site (Weston Report). The report states that U.S. EPA information indicated potential surface disposal of chlorinated solvents may have occurred at the Janes Avenue site (Weston Report).



**CERTIFICATE OF SERVICE**

I, Salvador K. Karottki, an attorney, hereby certify that I caused a copy of the Expert Report of Ronald B. St. John, PHG, PG, to be served upon the attached Service List by causing a copy of same to be sent via facsimile and United States mail, postage pre-paid, on September 29, 2003.

  
Salvador K. Karottki

## THIRD-PARTY SERVICE LIST

*The Lockformer Company, et al. vs. Arrow Gear, et al.*

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August 8, 2003 - last update

#### FOURTH-PARTY SERVICE LIST

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U.S. ENVIRONMENTAL  
PROTECTION AGENCY

NOV 17 2003

OFFICE OF REGIONAL  
COUNSEL

# **NOTICE**

Ellsworth Industrial Park

Special Notice Letter

**U.S. ENVIRONMENTAL PROTECTION AGENCY  
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*Faxed IEPA  
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10/11/2002 @ 3:20 p.m.*